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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TREMONT SECURITIES LAW, STATE Master File No. LAW AND INSURANCE LITIGATION : 08 Civ. 11117 (TPG)

This Document Relates to:

YALE M. FISHMAN 1998 INSURANCE TRUST, Individually and on Behalf of All Others Similarly Situated and Derivatively on Behalf of : the Nominal Defendant,

Plaintiff,

- against -

PHILADELPHIA FINANCIAL LIFE ASSURANCE COMPANY F/K/A AGL LIFE ASSURANCE COMPANY, et al.

Defendants.

YALE M. FISHMAN 1998 INSURANCE

TRUST, et ano, Individually and on Behalf of All: 11 Civ. 1284 (TPG) Others Similarly Situated and Derivatively on

Behalf of the Nominal Defendant,

11 Civ. 1283 (TPG)

ECF CASES

: Electronically Filed

GENERAL AMERICAN LIFE INSURANCE COMPANY, et al.,

Defendants.

- against -

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties hereto, as follows:

- 1. The time for defendants to file reply papers in further support of their motions to dismiss plaintiffs' consolidated amended complaints, based upon a request from certain defendants, shall be and hereby is adjourned from July 27, 2012 to August 14, 2012 (August 27, 2012 for Tremont Opportunity Fund III, L.P., Rye Select Broad Market Insurance Fund L.P., Rye Select Broad Market Prime Fund, L.P. and Rye Select Broad Market XL Fund, L.P. (the "Funds") and defendants Manzke and Hammond).
- This stipulation does not constitute a waiver by defendants of any substantive or procedural defenses to the consolidated amended complaints.

The Court has previously adjourned the reply deadlines in these actions twice, in connection with adjournments of other deadlines in the cases.

Dated: New York, New York July 20, 2012

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United States District Court Judge 50, 2012